

# SCHAGRIN ASSOCIATES

1100 FIFTEENTH STREET, N.W.

SUITE 700

WASHINGTON, D.C. 20005

(202) 223-1700

FAX (202) 429-2522

EMAIL: schagrins@erols.com

April 9, 2001

BY HAND

The Honorable Donald Evans  
Secretary of Commerce  
Attn: Import Administration  
Central Records Unit  
U.S. Department of Commerce  
14th Street and Constitution Avenue, N.W.  
Washington, DC 20230

Inv. Nos. A-588-857 and A-201-828  
Total Pages: 7  
Investigations  
Enforcement Group III,  
Offices 8 and 9

**Public Document**

Attn: Richard Weible  
Ed Yang

Re: *Antidumping Investigation of Certain Welded Large Diameter  
Line Pipe from Japan and Mexico*

Dear Mr. Secretary:

On behalf of petitioners American Steel Pipe Division of American Cast Iron Pipe Company, Berg Steel Pipe Corporation, and Stupp Corporation, we hereby request that the Department of Commerce (the "Department") exclude certain products, as described below, from the scope of the above-captioned investigation.

## **Petitioners' Requests for Exclusion**

Petitioners respectfully request that the Department exclude certain welded large diameter line pipe merchandise that meets the following specifications.

1. Certain welded large diameter line pipe of outside diameter greater than or equal to 18 inches and less than or equal to 22 inches, with wall thickness measuring 0.750 inch or greater, regardless of grade.

2. Certain welded large diameter line pipe of outside diameter greater than or equal to 24 inches and less than 30 inches, with wall thickness measuring greater than 0.875 inches in grades A, B, and X42, with wall thickness measuring greater than 0.750 inches in grades X52 through X56, and with wall thickness measuring greater than 0.688 inches in grades X60 or greater.

3. Certain welded large diameter line pipe of outside diameter greater than or equal to 30 inches and less than 36 inches, with wall thickness measuring greater than 1.250 inches in grades A, B, and X42, with wall thickness measuring greater than 1.000 inches in grades X52 through X56, and with wall thickness measuring greater than 0.875 inches in grades X60 or greater.

4. Certain welded large diameter line pipe of outside diameter greater than or equal to 36 inches and less than 42 inches, with wall thickness measuring greater than 1.375 inches in grades A, B, and X42, with wall thickness measuring greater than 1.250 inches in grades X52 through X56, and with wall thickness measuring greater than 1.125 inches in grades X60 or greater.

5. Certain welded large diameter line pipe of outside diameter greater than or equal to 42 inches and less than 64 inches, with wall thickness measuring greater than 1.500 inches in

grades A, B, and X42, with wall thickness measuring greater than 1.375 inches in grades X52 through X56, and with wall thickness measuring greater than 1.250 inches in grades X60 or greater.

6. Certain welded large diameter line pipe of outside diameter greater than 64 inches and of any grade or wall thickness.

**Petitioners' Responses to Additional Comments by Other Interested Parties**

In a February 20, 2001 letter to the Department, Kawasaki Steel Corporation, Nippon Steel Corporation, NKK Corporation, and Sumitomo Metal Industries, Ltd. ("SMI") requested that the Department exclude products meeting the specifications described below from the scope of this investigation. Petitioners hereby respond to these requests as follows.

**1. Large diameter line pipe for deep water application**

Respondents requested an exclusion for line pipe used in deep water applications, which means for water depths of 1,500 feet or more, intended for use in and actually used for a specific deep water project, and rated for a specified minimum yield strength of not less than 60,000 psi.

Petitioners retain an interest in having these products remain within the scope of the investigation, and therefore oppose this proposed exclusion for all grade, outside diameter, and wall thickness combinations other than those that petitioners have specifically proposed to exclude.

**2. Arctic-grade line pipe**

Respondents requested a 1) exclusion for arctic-grade line pipe, defined as, 1) under a Charpy V-notch test performed at -50 degrees Fahrenheit or below applied to three specimens